

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	17-cr-64-DWF-KMM
	)	
v.	)	<b>DEFENDANT’S UNOPPOSED</b>
	)	<b>MOTION TO EXTEND FILING</b>
EDWARD S. ADAMS,	)	<b>DEADLINE</b>
	)	
Defendant.	)	

Mr. Adams respectfully requests a modest extension of the current briefing deadlines set forth in the June 25, 2018 Order (ECF No. 165). Under this proposal, Mr. Adams’s reply in support of his motion to dismiss or in the alternative to disqualify (ECF 141), reply in support of his motion to suppress (ECF 147), and his opposition to the government’s motion contesting the application of privilege (ECF 192) all would be due on or before **Friday, August 17**.

Mr. Adam’s reply deadline was originally set for August 6 (ECF 165). Thereafter, the government received an extension to file two of its opposition briefs. (ECF 170 & 171). The July 23 Order did not address Mr. Adams’s reply deadline for those two briefs, however the government’s motion noted that Mr. Adams’s consent was based on an in-kind extension of his reply deadlines. Thus, Mr. Adams understands his reply to ECF 147 is currently due on August 6, and his other two briefs are due on August 10.

Mr. Adams believes that the deadline for his three briefs should be aligned on a single date, as the briefs are closely interrelated. Mr. Adams also believes that his request

for an approximately one-week extension is justified due to the length of the government's briefs (138 pages of briefing), the substantial additional factual disclosures that the government has made in connection with its briefs (including transcripts of grand jury testimony and the IRS Special Agent Report), and novel factual allegations of uncharged fraud by Mr. Adams in connection with the government's new theory that the crime-fraud exception applies to his communications with Murry LLC.

Counsel for Mr. Adams has met and conferred with the government regarding this proposal. Counsel for the government has no objection to aligning the deadlines for Mr. Adams's reply briefs so that all are due on Friday, August 17.

Dated: August 1, 2018

Respectfully submitted,

/s/ Lance Wade

Joseph G. Petrosinelli (DC Bar #434280)

Lance Wade (DC Bar #484845)

Gloria K. Maier (DC Bar # 1012208)

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

Telephone: (202) 434-5000

jpetrosinelli@wc.com

lwade@wc.com

gmaier@wc.com

James L. Volling (#113128)  
Deborah A. Ellingboe (#26216X)  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55420  
Telephone: (612) 766-7000  
Facsimile: (612) 766-1600  
james.volling@faegrebd.com  
debbie.ellingboe@faegrebd.com

Attorneys for Defendant Edward S. Adams